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July 8, 2021

By ECF

The Honorable Gregory H. Woods
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: **United States v. Jeffrey Hastings**, 20 Cr. 534 (GHW)

Dear Judge Woods:

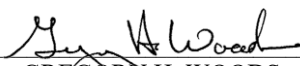
We write respectfully on behalf of our client, Jeffrey Hastings, to request permission to submit (i) an unredacted version of Mr. Hastings's Memorandum in Support of his Motion *in Limine*, and (ii) an unredacted version of Jeffrey Johnston's Declaration in Support and accompanying exhibits under seal and *ex parte* to the Court for its *in camera* privilege review. *See Vector Cap. Corp. v. Ness Techs., Inc.*, No. 11 CIV. 6259 PKC, 2014 WL 171160, at *2 (S.D.N.Y. Jan. 9, 2014) ("Whether or not a document is privileged is fact specific and frequently requires *in camera* review.").

The Court cannot evaluate Mr. Hastings' sealing request with the information before it. Mr. Hastings is ordered to submit unredacted versions of the motion, declaration, and exhibits for the Court to review. By permitting Mr. Hastings to submit unredacted versions of his documents to the Court for its review, the Court is not ruling on the sealing request. Those documents should be provided to the Court forthwith.

Mr. Hastings' request to submit the materials *ex parte* is denied without prejudice. The Court does not understand there to be a basis for reviewing the documents *ex parte*. Based on the information presented to the Court, it appears that the Government is already in possession of the documents that Mr. Hastings wishes to submit for *ex parte* review, with the possible exception of Exhibit B. If Mr. Hastings wishes to renew his request, he is ordered to do so by no later than July 12, 2021.

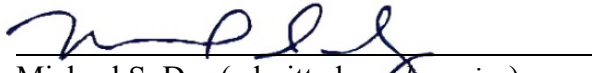
SO ORDERED.

Dated: July 9, 2021
New York, New York


GREGORY H. WOODS
United States District Judge

Vinson & Elkins LLP Attorneys at Law
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Richmond Riyadh San Francisco Tokyo Washington

Sincerely,


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